## **EXHIBIT B**

## <u>Witnesses and Individuals Likely to Have Discoverable Information Identified in Defendants' Supplemented Initial Disclosure Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i)</u>

- 1. Alexandru Apostol, General Manager of Cotechno Group, Inc. ("CGI"), 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902
- 2. Elena Cristina Apostol, President of Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902
- 3. Efrain Gonzalez, Production Manager at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Gonzalez has knowledge related to the subject matter of the allegations in the Complaint filed by Terra Supreme Battery LLC's ("Terra Supreme Batter" or "TSB").
- 4. Adrian Ceballos, Second Shift Supervisor and Head Technician at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Ceballos has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 5. Roberto Medrano, Maintenance Manager at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Medrano has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 6. William Heath, Plant Manager at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Heath has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 7. Gabriel Nitu, Engineering Manager and Product Development at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Nitu has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 8. Andrei Apostol, Accounting Manager at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Andrei Apostol has

- knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 9. Eduardo Arias, Accounting Systems at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Arias has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 10. Morgan Ward, Office Manager at Cotechno Group, Inc., 1942 South IH-35, Suite 107, San Marcos, TX 78666 can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Medrano has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 11. Yannis Kanarakis, Logistics and Inventory Manager with CGI, 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802, (260) 222-2902. Kanarakis has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 12. Oscar Montoya with CGI (Spanish language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Montoya has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 13. Cristhian Yanes Videa with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Videa has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 14. Maricela Gonzalez with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Marciela Gonzalez has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 15. Jose Cruz Gonzalez with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Jose Gonzalez has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.

- 16. Natividad Peres with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Peres has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 17. Nelson Hernandez with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Hernandez has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 18. Becer Cecilio Avila Matute with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Matute has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 19. Danny Barahona with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Danny Barahona has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 20. Josue Gerardo Barahona with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Josue Barahona has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 21. Jose Ernesto Barahona Garcia with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Jose Garcia has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 22. Martin Gonzalez with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Martin Gonzalez has knowledge related

- to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 23. Cenia Funez Corea with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Corea has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 24. Wayne Brod with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Brod has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 25. Geovanny Vallecillo Ramos with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Ramos has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 26. Mayra Gutierrez with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Gutierrez has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 27. Alonso Garcia with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Alonso Garcia has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 28. Bartolo Yon Sajquiy with CGI (Spanish Language), 1942 South IH-35, Suite 107, San Marcos, TX 78666, can be contacted through PODLASKI LLP, 110 E. Berry St., Suite 101, Fort Wayne, IN 46802; (260) 222-2902. Sajquiy has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 29. R.J. (Rick) Blanyer, Co-inventor/Consultant, 1 Mulberry Rd, Kerrville, TX 78028, 512 845 4487. Blanyer has knowledge related to the subject matter of the allegations in

- Terra Supreme Battery's Complaint, including, but not limited to the battery technology and performance, various quotes, and contracts entered with Terra Supreme Battery.
- 30. Nancy Jay, 4305 Hyridge Dr., Austin, TX 78759, 512 343 4800. Nancy Jay has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 31. Benny Jay, 4305 Hyridge Dr., Austin, TX,. Benny Jay is Chief Technology Officer at Terra Supreme and has knowledge related to the subject matter of the allegations in Terra Supreme's Complaint.
- 32. Mitch Vaughn, Owner of Vaughn Industries, 2605 South IH 35 #400, San Marcos, TX 78666, 512 787 8081. Vaughn has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 33. Carlos Coe, Millenium Energy, 103 Stone Cyn, Wimberley, TX 78676, 512 757 4488. Coe has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 34. Darrel Skogman CEO of Comtex, Inc., 1010 Fleming Dr., Seguin, TX 78155, 830 660 2502. Skogman has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 35. Rick Lewis, Sr. Design Engineer at Chatsworth Products Inc., 3004 S. Austin Avenue Georgetown TX, 78746, 512.868.6061. Lewis has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 36. C.J. Davis, Owner of CJ Panel & Automation, Inc., 1664 Centerpoint Road, San Marcos, TX 78666, <u>512-210-8511</u>. C.J. Davis has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 37. PLC Programmer, CJ Panel & Automation, Inc., 1664 Centerpoint Road, San Marcos, TX 78666, <u>512-210-8511</u>. Contractor has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 38. Dennis Sales, VP of Sales of Restex Composites, 6050 Tri County Pkwy, Schertz, TX 78154, 210 651 9810. D. Sales has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint
- 39. Brian Yutzy, Director of Engineering at EControls, in San Antonio, TX, 830 660 0810. Yutzy has knowledge related to the subject matter of the allegations in TSB's complaint.
- 40. Stephan Porter, President of St. Maximus Consulting, 1201 FM 2722, New Braunfels, TX 78132, 210 383 3831. Porter has knowledge related to the subject matter of the allegations in TSB's complaint.

- 41. Mike Thompson, Owner of San Marcos Waterjet, 233 Deertrail Dr., San Marcos, TX 78666, 512 396 1311. Thompson has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 42. Mike Rhea, Owner of San Marcos, Bearings, 417 McGehee St., San Marcos, TX 78666, 512 396 1900. Rhea has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 43. Austin Curtis, Owner of Guadalupe Logistics, 1942, S. Interstate 35, San Marcos, TX 78666, 830 708 7697. Curtis has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 44. Representative of Hofmann's Supply, 440 S. Guadalupe St., San Marcos, TX 78666, 512 396 8606. Representative has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 45. Tom Lekander, Owner of Enviro Solutions, 625 Humble Ave, San Antonio, TX 78225, 210 696 6300. Lekander has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 46. Garry Gates, CEO of Gates Machine & Fabrication, 8025 Jethro Ln, San Antonio, TX 78266. Gates has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 47. David Jabour, President of Twin Liquors, 5639 Airport Blvd A, Austin, TX 78751, 512 222 0700. Jabour has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 48. Representative of SunSource, 1833 Johanna Dr, Houston, TX 77055, 888 786 7723. Representative has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint
- 49. Representative of Protank Southwest, 5907 Aldine Bender Road, Houston, TX 77396, 281 441 8265. Representative has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 50. Representative of Wilson Company, 6740 Guada Coma Dr, Schertz, TX 78154, 210 680 2496. Representative has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 51. Angie Pounders, Belvoir Real Estate Group, LLC., 15835 Park Ten Pl, #150, Houston, TX 77084, 713 332 8202. Belvoir has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.

- 52. Representative of Finzer Roller Company, 3200 Pinewood Dr, Arlington, TX 76010, 817 4243156. Belvoir has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 53. Brandon Vaillancourt, Controls Engineer at ATD Engineering & Machine, LLC, 533 N. Court, Au Gres, MI 48703, 989-876-7161 x224. Vaillancourt has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 54. Joel Truax, Controls Engineer, 4581 Tee Lake Rd., West Branch MI 48661. Truax has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint.
- 55. Edgar Rocha with Ryerson, Inc., 3530 South Loop E Houston, TX 77021, 713-747-1110. Rocha has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 56. Brittany Rabreau with Shaw Steel & Alloy, 899 Mountain Industrial Drive, Marietta GA 30060, 770-427-0402. Rabreau has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 57. Ben Jones with Purvis Industries, 10357 W Sam Houston Pkwy N, Houston, TX 77064, 713-856-5600. Ben Jones has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 58. Brie Grissom with Boedecker Plastics, 904 6th St, Shiner, TX 77984, 361-594-2941. Grissom has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 59. Clayton French with Earle M. Jorgensen Company, 6201 Lumberdale Rd, Houston, TX 77092, 713-672-1621. French has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.
- 60. Chris Shaw with Elliott Electric, 1904 Dutton Dr, San Marcos, TX 78666, 512-392-4310. Shaw has knowledge related to the subject matter of the allegations in Terra Supreme Battery's Complaint and CGI's Counterclaims.